



July 24, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

GN Docket No. 12-354

Dear Ms. Dortch;

SmartBurst LLC. is a fixed wireless Internet service provider (WISP) delivering high-speed Internet access to homes and businesses in North Texas and we are committed to providing fixed wireless access to more Americans. We are a member of the Wireless Internet Service Provider's Association.

Based in Aubrey, TX and founded in 2005 in order to provide fast reliable internet services, our service area in rural North Texas includes the Counties of Denton, Cooke, and Grayson as well as a few homes and businesses in the towns of Aubrey, Denton, Pilot Point, Sanger, Whitesboro, Collinsville, Valley View, Tioga and is actively expanding into other communities in the area. Currently the SmartBurst Internet service area is 413 square miles and the population within that area numbers nearly 35,000. Almost all of our customers are rural in nature and only a few are located in the incorporated areas or towns mentioned. We offer speeds up to 15mbps and are planning on deploying equipment capable of much faster speeds, however part of the challenge is we utilize spectrum that must be shared with other users including the 3650-3700 Mhz Band. We have invested in and deployed equipment and currently provide services to users in this 3650-3700 Mhz band and plan to continue to do so unless the Commission adopts the proposal of the CTIA and T-Mobile due to the uncertainty it proposes.

CTIA and T-Mobile have recently filed petitions for rulemaking with the FCC that would fundamentally change the Citizens Broadband Radio Service (CBRS), which includes the 3550-3650 MHz band and the existing 3650-3700 MHz band. The mobile industry wants to change the rules so they are friendlier to 5G services that they are developing, though they concede that actual deployment of 5G in the CBRS band will be years away. The effect of the proposals will effectively foreclose other uses and create a "5G-only" band.

These proposed rule changes would make the cost of acquiring protected Priority Access Licenses (PALs) through auction significantly higher, pricing out many small would-be bidders like SmartBurst and essentially ensuring that the large mobile wireless carriers have exclusive access to the spectrum for an indefinite period of time over a large geographic area. Smaller providers like SmartBurst, even if they had the means to outbid

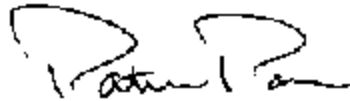
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the large carriers, would be forced to acquire large-area licenses (multiple counties) that are likely much larger than the targeted areas SmartBurst and other WISPs would want to serve. In addition, T-Mobile (but not CTIA) also proposes rules that eliminate the GAA tier in the 3650-3700 MHz band without accommodating existing 3650-3700 MHz users and this could present serious interference problems if newcomers are not required to protect incumbents.

SmartBurst opposes the mobile industry's plans. If adopted, the mobile industry's proposals would seriously undermine existing investment in 3650-3700 MHz and greatly inhibit further investment and deployment in the entire 150 megahertz of spectrum and severely limit the benefits that were created in this band for rural broadband deployment.

Millions of American citizens living in rural and underserved areas served by small providers like SmartBurst must be afforded the same opportunity to receive fast, dependable Internet services, therefore we respectfully request that the Commission reject the petition of of CTIA and T-Mobile.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Patrick Parks". The signature is stylized with a large, looped "P" and a cursive "Parks".

Patrick Parks
President
SmartBurst LLC